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10 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA

11 **SAN FRANCISCO DIVISION**
12

13
14 **In re:**

15 **PG&E CORPORATION,**

16 **- and -**

17 **PACIFIC GAS AND ELECTRIC**
18 **COMPANY,**

19 **Debtors.**

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

22 ** All papers shall be filed in the Lead Case, No.*
23 *19-30088 (DM).*
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Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF REORGANIZED DEBTORS'
OBJECTION TO CLAIM (CLAIM NO.
58462, FILED OCTOBER 17, 2019, OF
SPIRO JANNINGS)**

Response Deadline:
October 26, 2021, 4:00 p.m. (PT)

**Hearing Information If Timely Response
Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **TO: (A) THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**
3 **CLAIMANT[S]; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**


4 The Reorganized Debtors,¹ pursuant to Federal Rule of Evidence 201, hereby request the Court
5 take judicial notice of the following document submitted as evidence in support of the Reorganized
6 Debtors' Objection to the Claim of Spiro Jannings:

7 Complaint filed by Spiro Jannings in the case "*Jannings v. Pacific Gas and Electric*," Santa
8 Clara County Superior Court Case No. 17CV315033. *See United States v. Wilson*, 631 F.2d 118, 119
9 (9th Cir. 1980) (a court may take judicial notice of its own records, as well as the records of other
10 courts in other cases); *Neilson v. Union Bank of Calif., N.A.*, 290 F. Supp. 2d 1101, 1113 (C.D. Cal.
11 2003) ("Court orders and filings are the type of documents that are properly noticed" under Federal
12 Rule of Evidence 201). A true and correct copy of the Jannings' complaint, but with redactions to
omit the name of Jane Doe, Mr. Jannings' supervisor, is attached hereto as **Exhibit A**.

13 Under Federal Rules of Evidence 201, the Court "must take judicial notice if a party requests
14 it and the court is supplied with the necessary information." Fed. R. Evid. 201(b). The Reorganized
15 Debtors have satisfied this criteria by this Request for Judicial Notice. Accordingly, the Reorganized
16 Debtors respectfully request that the Court take judicial notice of the above-described Complaint
17 submitted as evidence in support of Reorganized Debtors' Objections to the Claim of Spiro Jannings.

18
19 Dated: October 6, 2021

KELLER BENVENUTTI KIM LLP
LITTLER MENDELSON P.C.

21
22 By: 
Elisa Nadeau

Attorneys for Debtors and Reorganized Debtors

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25 4833-6568-7550.1 / 101443-1005

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27 _____
28 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the
Reorganized Debtors' Objection to Claim (Claim No. 58462, Filed October 17, 2019, of Spiro
Jannings), filed contemporaneously herewith.